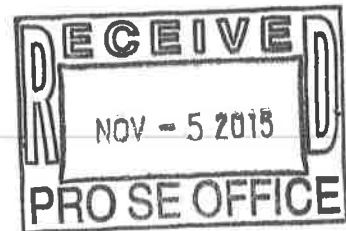


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKSAM ARTHUR SABET**15CV 8698**

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT**-against-**FACEBOOK, INC.Jury Trial: ☒ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name SAM ARTHUR SABET
 Street Address 35-26 28th St A
 County, City Astoria, NY
 State & Zip Code 11106
 Telephone Number 631-440-2482

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name FACEBOOK, INC.
 Street Address 156 University Avenue

County, City Palo Alto, CA
 State & Zip Code 94301
 Telephone Number _____

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Questions

☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action along with the dates and locations of all relevant events

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? FACEBOOK, INC.

B. What date and approximate time did the events giving rise to your claim(s) occur? CURRENTLY UNKNOWN

C. Facts: SEE ATTACHED

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

ATTACHED

SEE FACTS & LEGAL THEORY

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. SEE REMEDIATION ATTACHED

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5 day of November, 2015.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Inmate Number

Facts and Legal Theory

On October 9th, 2015 I, the plaintiff, Sam Arthur Sabet was prompted to remove all so-called “likes” from my “Facebook, Inc.” non-profit organization page’s “like count” which can be found at the URL: www.facebook.com/aryanheritage due to the question as to whether these likes were legitimate “likes” or so-called “spam-likes.” The ACHF depends on social networking to run its operation in order to “Safeguard” (protect, preserve, and promote) Aryan or Indo-European cultural heritage (history, linguistics, and comparative mythology/religion), but “spam-likes” are known by online marketing specialists to work against any industry (commercial or non-commercial) that engages in online promotions and advertising, two-fold: 1.) hidden “likes” and ingenious or “spam-likes” work to the disadvantage of any industry’s reputation, increasing the chances for “tarnishing” or “damaging” the industry in question’s “reputation” by giving the impression to any prospective consumer that the industry itself is not authentic, in turn contributing to “loss” 2.) hidden “likes” and “spam-likes” from an analytical point of view provide the industry’s analysts itself with a false sense of how well the industry is actually operating. This being said: “Facebook Inc.” claims to provide the service offering non-profit organization owners the opportunity to promote their own services or products with the help of this platform. Furthermore, after having done the investigation on Facebook’s “Help Site” which they claim will provide consumers with all the answers to their solutions I, the plaintiff, learned from this designated “Help Site” that all the “spam-likes” in question are supposed to have been addressed already and removed from all facebook page user’s “like-count,” yet whereas initially www.facebook.com/aryanheritage’s “like-count” read over 800 “likes” due this case of alleged “spam-likes,” I, the plaintiff, was forced to remove all the likes I could. Presently the www.facebook.com/aryanheritage’s only has 8 registered “likes, yet the page’s “like-count” still reads 328 “likes” which exceeds the “like-count” of registered “www.facebook.com/aryanheritage” “like-count” by 320 a figure far too high a “like-count” for this present “like-count” not to be “spam-likes.” To make matters worse: “Facebook, Inc.’s” customer service line does not provide human support. Instead the site’s customer service line redirects callers to the “Help-Site.” If these remaining 320 “likes” shown on www.facebook.com/aryanheritage’s “like-count” are not “spam-likes” then they could be “hidden-likes.” Nevertheless Facebook, Inc. only allows its consumer’s to control or remove “likes” that are not set by users to remain hidden while Facebook, Inc. does not allow its consumers the ability to control or remove these “hidden-likes.” Either way both “spam-likes” as well as “hidden-likes” impose a problem for consumers when it comes to a consumer’s reputation as well as in regards to analysis, not to mention both these “likes” impose a security issue for the consumers of Facebook, Inc. in question.

Merits

Specific Performance: This is when the court forces the breaching party to perform the service or deliver the goods that they promised in the contract. This is typically reserved for cases when the goods or services are unique and no other remedy will suffice.

Remedies

This problem of online internet security and cyberattack related issues is, no doubt, a growing one, and on top of these problems, by relegating customer and technical service issues from human support to internet support (by way of email or chat forums) the IT sector as a whole, so that companies can reallocate resources and maximize on profits, increasingly do not appear to be capable of maintaining the services in which they claim to provide and this, as can be evidenced on myriad technical support forums, can only lead to consumer discontent, a depreciation in consumer confidence, and “damages” to not only individual commercial and non-commercial industries, but the nation’s reputation included. Something has got to be done about this. More and more the world in its entirety is becoming dependent on the IT sector and the strings to monitor commercial fraud and maleficence. Currently IT provides for 1/3 of the world’s income. All this being said: because I, the plaintiff, Sam Arthur Sabet cannot act on behalf of a non-profit corporation as a *pro se* litigant I therefore motion for “Remedies in Equity” on grounds for “Breach of Contract” or Facebook, Inc.’s “failure to perform their terms of written contract without a legitimate legal excuse,” “not completing their job” in regards to 1.) addressing the “spam-like” or “hidden-like” problem in question 2.) not providing adequate customer support to alleviate this problem of “spam-likes” or “hidden-likes” and for contributing to a considerable “loss of time and inconveniences” to me for the reasons stated above, *as a general consumer* of the company’s services, and request that the Court establish an injunction against Facebook, Inc. for the “Specific Performance” of reducing the “spam-like count” on my facebook page “www.facebook.com/aryanheritage” to a figure no more than the number of the “www.facebook.com/aryanheritage’s” seeable registered “likes.” Additionally, I advise the Court to make it mandatory a general rule that online industries such as “Facebook, Inc.” and the like (eg. Twitter, all of Google’s subsidiary companies, etc... all online commercial and non-commercial industries) must provide its customers with human customer service and technical support, unless the Court is indifferent as to the question of business and ethnics and whether a business is supposed to provide its customers with genuine support and legitimate assistance regarding its products or services, or leave its customers hanging with no possible way to address a solution to their problem relative to the product or service being offered or provided on their own.